

Sent via ELECTRONIC MAIL to cassandra.enos@deltacouncil.ca.gov

April 26, 2017

Ms. Cassandra Enos-Nobriga
Deputy Executive Officer, Planning
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Subject: Association of California Water Agencies' Comments Regarding Revisions to the Draft Delta Plan Amendment Regarding Conveyance, Storage Systems, and the Operation of Both

Dear Ms. Enos-Nobriga:

The Association of California Water Agencies ("ACWA") appreciates the opportunity to comment on the Delta Stewardship Council's ("DSC's") revised draft of the Delta Plan amendment regarding conveyance, storage systems, and the operation of both ("CSO amendment"). ACWA represents over 430 public water agencies that collectively supply 90% of the water delivered in California for domestic, agricultural, and industrial uses.

ACWA supports the latest staff proposed changes to the Discussion Draft of the CSO amendment. The draft CSO amendment promotes options for new and improved infrastructure relating to water conveyance in the Delta, storage systems, and the operation of both to achieve the coequal goals of "providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem."

The coequal goals should be implemented with a comprehensive approach for the sustainable development, management, and protection of California's water resources. For water supply reliability, all of the tools in the toolbox are needed. The current draft CSO amendment will help advance the storage, conveyance, and operations elements as part of "a portfolio of actions to comprehensively address" California's water challenges. These challenges are identified in Governor Brown's California Water Action Plan.¹ This comprehensive approach is also articulated in ACWA's Statewide Water Action Plan for California² (ACWA SWAP), and is broadly supported by public water agencies statewide. The ACWA SWAP identifies a Delta solution as "a critical component of a broader set of actions that will address water supply reliability and ecosystem health in California."³

¹ *California Water Action Plan 2016 Update*. Jan. 2016. p. 22.

² *ACWA Statewide Water Action Plan for California* (October 2013)

³ *Ibid.* p. 6

In particular, ACWA supports the latest staff proposed changes to the Discussion Draft of the CSO amendment (Attachment 2 for Agenda Item 14 of the April 27-28, 2017 meeting):

- On page 3: “Conveyance, system storage, and operations are part of a broad and integrated portfolio of actions described in the Delta Plan... Deploying one tool independent of the others is ineffective. It is only through the combination of new and improved Delta conveyance, the effective management of existing and expanded surface water and groundwater storage, and the balanced operations of both – combined with other actions and recommendations contained in the Delta Plan – that we can achieve the coequal goals.”
- On page 17: “The California Department of Water Resources and the U.S. Department of the Interior, Bureau of Reclamation should pursue a dual-conveyance *option* for the Delta.” (Emphasis added.) “Option” has replaced “solution,” which has been stricken from the revised draft.

ACWA appreciates the opportunity to comment on the draft Delta Plan CSO amendment regarding conveyance, storage systems, and the operation of both. We look forward to continued work with the DSC to help identify ways to implement a comprehensive strategy to manage California’s water resources. If you have any questions, please contact me at or Adam Borchard at (916) 441-4545.

Sincerely,



David Bolland
Director of State Regulatory Relations

cc: The Honorable Randy Fiorini, Chair, Delta Stewardship Council
The Honorable Susan Tatayon, Vice Chair, Delta Stewardship Council
The Honorable Frank Damrell, Member, Delta Stewardship Council
The Honorable Mike Gatto, Member, Delta Stewardship Council
The Honorable Patrick Johnston, Member, Delta Stewardship Council
The Honorable Skip Thomson, Member, Delta Stewardship Council
The Honorable Ken Weinberg, Member, Delta Stewardship Council
Ms. Jessica Pearson, Executive Officer, Delta Stewardship Council
Mr. Tim Quinn, Executive Director, ACWA
Ms. Cindy Tuck, Deputy Executive Director of Government Relations, ACWA